



RIM is your source for any questions or directions pertaining to the maintenance, retention, storage and destruction of all MCI records.

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Records Management Program – Policies & Procedures

RIM's Website

<https://teamnet2.mcilink.com/departments/rim/>

Records Management Program – Policies & Procedures

**The following presentation was done for the
Accounts Payable department in early 2001.**

Records Management Program – Policies & Procedures



Records and Information Management

RECORDS COMPLIANCE PROGRAM

RIM's Website:

<https://teamnet2.mcilink.com/departments/rim/>

Points of Contact:

Daily record management activities and offsite storage:

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Mandatory Program

- ◆ The Company and its employees must adhere to all state, federal and operational record keeping requirements.
- ◆ All levels of management are held accountable for their department's compliance.
- ◆ Adherence to the Program and the requirements outlined in the Record Retention Schedule is mandatory, without exception
- ◆ Each department will be audited periodically for compliance.

Records & Information Management **Scope and Objectives**

- ◆ Oversee and assist with the daily record management and retention practices in MCI.
- ◆ Identify and Secure Vital Records...advise and educate on safeguards and retention requirements.
- ◆ Institute a Disaster Recovery Plan for all company records and information...business continuity in the event of a disaster.
- ◆ Ensure regulatory compliance...Federal/State mandates
- ◆ Minimize litigation risks...review records/information for retention requirements, identifying records that can be destroyed as soon as operational needs are met.
- ◆ Assist in identifying Operational Records and determining their required retention / destruction.
- ◆ Assimilate new records management technologies

A Record is...

A record is any information, regardless of medium or specific characteristics, created, received, used or distributed by MCI in the course of its business. This includes paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.



Only the *official copyholder* of a record is required to retain a record for the total retention period indicated in the RRS. If you maintain originals, you are the official copyholder. Creating a record does not mean you are the official copyholder; you must also maintain the original. Copies should not be stored or kept once your operational need is completed.



E-mail is just another form in which records/information is received.

- ◆ E-mail received or created in the course of business is an official record. It is the message within the e-mail that should be considered for retention, not who the message is from.
- ◆ The retention period is based on the content of the message. For example, an e-mail message between a MCI employee and a vendor must be retained for the time period specified for vendor correspondence.
- ◆ Keep in mind that, approximately, one percent or less of all e-mail sent or received has a true retention value. For internal e-mail messages, the sender has the obligation to follow any retention requirements, not the recipients. For e-mail messages coming from an external source, the recipient needs to either purge or retain pursuant to the Records Retention Schedule. Since a majority of e-mail has no retention requirement, all employees should be deleting e-mail once the retention requirement or operational need is complete. Operational need should not exceed one year from the receipt or sending the message.
- ◆ Specific company policy on e-mail, as written by Legal, can be located at:
<https://teamnet2.mcilink.com/departments/lppgc/techlaw/>

Vital Records

- ◆ Vital records contain information that is essential to reestablishing or continuing an organization in the event of a disaster.
- ◆ Vital records are essential:
 - to continue Company operations,
 - to recreate the Company's legal and financial position, and
 - to preserve the rights of the Company, its employees, customers, and stockholders.
- ◆ Examples of Vital Records are: ledgers & journals, customer billings, mergers, articles of incorporation, patents/copyrights and stockholders registers, design/documentation.
- ◆ Each department responsible for Vital Records must have a Disaster Recovery Plan. Contact RIM for details. The Plan must be provided to Records and Information Management.

Manager Responsibilities

- ◆ All Managers' working files for employees should be sent to the HR Fileroom once an employee no longer works for the company or your department. If an employee transfers to another department, you should send any manager notes regarding the employee to the HR Fileroom. It is acceptable, however, to give the new manager the employee's attendance record, performance review and PAF, but you cannot give those notes or written comments that are about or concern the employee.

The HR Fileroom is located at: 9835/700, 707 17th Street, Denver, Colorado 80202

- ◆ When an employee leaves the company, all files on his/her computer must be reviewed (including e-mail and e-mail attachments) for retention requirements under the Records Retention Schedule. The computer's records should be either retained or destroyed. Files that require retention must be pulled off the computer and stored appropriately. After this review, the computer's hard drive must be wiped clean of all records before being issued to a new user (even if this new user is in the same department).
- ◆ If a Manager receives a request from a terminated employee regarding getting copies of their travel and expense records or records contained within their personnel file, the Manager must refer the terminated employee to Law & Public Policy (LPP). No records or information may be given out to terminated employees (voluntary or involuntary) without prior approval from LPP.

Records Retention Schedule (RRS)



Records Management Program – Policies & Procedures

- ◆ A tool that identifies those records requiring retention and their required retention period.
- ◆ Primary objective : prompt disposal of records whose retention period has ended.
- ◆ The retention periods in the RRS are based on federal, state or local regulations and the company's operational needs.
- ◆ Retaining records longer than their legal or operational requirement exposes MCI to unnecessary financial and legal risk.
- ◆ MCI must avoid the perception that we are selectively disposing of records.
- ◆ Created based on the company's functional areas and records common to those areas. However, do not restrict yourself to a particular functional area. Your department can handle Legal, Accounting or Tax records.
- ◆ Assigns each "type" of record its unique Record Series (RS) number. Determination, by the user, of the correct RS number is important in calculating the correct destruction review date.
- ◆ "Just in case" is not a consideration in retention. Individual departmental determinations do not supersede or replace the MCI Record Retention Schedule. Requested exceptions are submitted to RIM.

WORLDCOM
Records Retention Schedule

PRIMARY CATEGORY : ACCOUNTING

Friday, January 05, 2001

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RS #	RECORD SERIES	DEFINITION	TOTAL (years)	COM
	1 ACCOUNTING	The management of receipts and expenditures, cost accounting and payroll, and the auditing of said functions.		
5	2 Audits	Audits of accounting records and/or procedures, including backup materials such as Internal Document Requests (IDRs).	C + T	FA, V
	2 Cash			
12	3 Accruals	Information concerning cash forecast and related accounts, such as Cash Forecast Reports, Cash Accrual Reports, etc.	1	
11	3 Accumulation Accounts	Cash balance reports for WCOM bank accounts	7	FA
13	3 Daily Cash Folders	Folders incorporating items such as Cash Concentration Report and Cash Report	3	
	3 Flow			

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Off-Site Storage

- ◆ All procedures associated with off-site storage are detailed on RIM's website.
- ◆ What you put in to storage is your individual responsibility. If someone tells you to send something to storage (or retain it on-site) and you know it is against retention policy you must challenge that request.
- ◆ All costs are paid by the RIM department, with the exception of:
 - Cartons returned to the submitter because of absence of inventory data.
 - Non-response to service request. You requested service from the storage vendor, but both you and your designated alternate point of contact were not present when the vendor's 'driver' arrived to deliver/pickup.
 - Rush orders.
 - Special projects, such as large audit or litigation retrievals. Contact RIM.
- ◆ Any questions or problems that you have about off-site storage, contact RIM. Do not contact the storage vendor.
- ◆ Review the records you are planning to archive to ensure they have a required retention. Only those records will be placed in off-site storage.
 - No copies, working papers, drafts, misc manuals, stuff from past employee's office/desk (w/o review), no data in electronic form unless the associated software/hardware system is retained.
- ◆ Standard Storage & Climate-Control Storage.
 - Climate controlled storage is available for records retained on such media as microfiche, CD, tape, etc. You must indicate this type of storage to the vendor (on the MCI Inventory Form) when submitting the materials to storage.
- ◆ Only 'like' records can be put in to each storage carton.
 - Invoices separated from correspondence. They have different RS codes – have different retention requirements.
- ◆ Storage Vendor – Iron Mountain – For the Virginia/Washington DC/ Maryland area:
Account # MWLDK

Off-Site Storage

continued

♦ **Completion of the MCI Inventory Form:**

- Use only the MCI Inventory Form (or the MCI Master Inventory Form), which can be downloaded from RIM's website.
- The storage vendor will refuse pick up if inventory forms are not with the cartons. With no exceptions.
- Complete every entry on the Inventory Form, except for the Retention Code.
- If entries are not completed correctly or clearly, retrieval of records will be very difficult and the proper retention period of the records may be jeopardized.
- Research the Record Classification Code in Record Retention Schedule. If you need any assistance please contact RIM. It is most important to assign the correct RS# to ensure proper retention.
- Use a clear description; a description recognizable by anyone in the company. Do not use acronyms, the words – miscellaneous, completed, JJ Bean's desk, records (we know they are records) etc.
- Fax a copy of your Inventory Form(s) to RIM for review, especially if this is your first submittal of records to off-site storage. We will review the forms for completeness and clarity, to avoid problems in the future.
- Xerox a copy of the Inventory Form for your records. Put the original with the cartons for pick up.
- Do not complete Inventory Forms for someone else; for example, someone directs you to 'send these files to storage' – but they are records that you have never worked. It is the responsibility of the employee that maintains the records, to review those records and prepare the Inventory Form. If RIM, or LPP or Tax, needs to inquire about inventory data on records, we must speak to the individual with knowledge about the records.
- If there is missing data on the Inventory Forms, the storage will contact the submitter and request that the information be provided to them within five working days. If the vendor does not receive the information the cartons will be returned to the submitter, with RIM's approval.



Off-Site Storage Continued

◆ Requests for service from the storage vendor.

All requests for service to the storage vendor are done through RIM's website and transmitted to the vendor via email.

When you submit a request the vendor will respond with a confirmation email, providing their delivery date and a service order number.

The vendor provides next-day service, if your order is received before 4pm.

Following are the service requests available:

- “*Storage Supply Requests*”: Storage supplies to include boxes and barcode labels. The Inventory Form requires a barcode label for each carton listed and a corresponding larger barcode label is affixed to the side of each carton.
- “*Electronic Box Retrieval Request Form*”: To request retrieval of a box from storage.
- “*Electronic Box Pickup Form*”: Dual use – to pickup new cartons for storage or pickup previously retrieved cartons for refile.
- The “*HR File Request/Return Form*” is utilized only by the HR fileroom in Denver.
 - “*File Level Request/Return Form*”. If all of the files contained in the carton have been individually inventoried and identified, each would be assigned its own file id# in addition to the carton’s barcode number. For further information on file-level inventory, contact RIM.

◆ Other points....

When completing the request form on the website, make sure you indicate the “District” in the pull-down menu.

- You must provide a dept# (or an 8-digit dept name/abbrev)
 - You must provide an “Alternate Contact Name” (point of contact). This is for the vendor’s driver. Make sure you tell your ‘alternate’ what service you requested – where the cartons are or what is expected to be delivered – and that the inventory forms are with the cartons.
 - Do not contact the storage vendor via telephone or any other means besides your service requests.

MCI records will not be delivered to mailrooms or delivery docks under any circumstances. The storage vendor has been notified of this policy. Contact RIM for exceptions, to include strong justification.

- Cartons retrieved from storage may only be ‘outcarded’ for ten business day days. RIM will notify you to return the carton(s) after this period or submit a justification to extend the retrieval time.

Records Management Program – Policies & Procedures

You must contact RIM if...

- | You need to retrieve records from off-site and reactivate them as active records on-site.
- | If you are consolidating cartons of records stored off-site. The barcode numbers must be accounted for.
- | If you have records stored off-site that have been identified for an audit or to be held in a litigation, these records must have a hold code assigned to them.
- | If you have questions or difficulties with services provided by the storage vendor.

Repercussions of Noncompliance

- | Can you identify records retained and retrieve them in an expedient manner? Can other departments – such Legal or Tax identify your records? Remember, a clear, recognizable description assigned to records will assist in this process.
- | Have you retained only company information identified in the RRS? Do you understand the repercussions?
- | Are you reviewing all information received by or produced in your department / area?
 - Emails
 - Computer hard drives
 - HR records maintained by Managers
 - Information held on a server
- | Can you answer detailed questions from RIM, Legal or Tax reference the records you submitted to storage? Or were you told to retain records / information of which you have no working knowledge?

Records Management Program – Policies & Procedures



**Policies &
Procedures**

RIM is your source for any questions or directions pertaining to the maintenance, retention, storage and destruction of all MCI records.

....active records, on-site records, stored records.....

[RIM's Website](#)

<https://teamnet2.mcilink.com/departments/rim/>

<p align="center"><i>You must fax a copy of your completed Workroom Box Inventory Form to RIM for review.</i> RIM Fax# : 703-341-9289 ALL ENTRIES ARE MANDATORY (except the Retention Code)</p>						
ACCT#	DATE	DEPT/ACCT CENTER	PHONE NO.	RIM APPROVAL		
103963	5/15/2001	9823	703-341-1234			
PREPARED BY		CITY/STATE	FAX NO.			
John Smith (the user of the records)		PCVII Arlington VA	703-341-4321			
STANDARD STORAGE		X	RECORD CLASSIFICATION CODE (RIM)	FROM (MM/DD/YEAR)	THRU (MM/DD/YEAR)	
TRANS-DOMESTIC STORAGE						
1	Carton Barcode # (place barcode label here)		RS 45	DATE RANGE	02/15/1999 02/28/1999	Use on approval by RIM
	Barcode labels are supplied by the storage vendor. Place the small label here, the corresponding large label goes on the side of the carton.		CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM) Vendor Invoices. Arco - Delmonico - Continue description, if needed -			
2	Carton Barcode # (place barcode label here)		RS 8	DATE RANGE	01/01/2000 01/31/2000	Use on approval by RIM
			CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM) Cancelled checks. Bank of America. 145923 - 146005 - Continue description, if needed -			
3	Carton Barcode # (place barcode label here)		RS	DATE RANGE		
			CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)			
4	Carton Barcode # (place barcode label here)		RS	DATE RANGE		
			CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)			
5	Carton Barcode # (place barcode label here)		RS	DATE RANGE		
			CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)			

Records Management Program – Policies & Procedures

The following are questions compiled for training of daily RIM personnel.

Records Management Program – Policies & Procedures

1. What is the RIM Program? What does it entail? What is RIM's goal and purpose?

The objectives of the Records Management Program are to ensure legal compliance, audit protection, access to valuable information, cost savings and orderly and efficient records life-cycle management.

RIM's main goal is to protect the company from any legal and financial risks by ensuring the safety and security of all company records. This is done in many ways; however, employee education and ensuring department compliance to the Program through audits are two ways.

2. What is a record?

The term "record" is defined as any and all recorded information (regardless of medium or specific characteristics) that is created, received, used or distributed by the Company in the course of business. This includes paper, microfilm, tape, microfiche, electronic e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

3. What is a Records Retention Schedule (RRS)? What do the columns mean?

The RRS is a tool – established and maintained by RIM - used by all MCI employees to determine the disposition and retention requirements of ALL records created, received, used, and distributed by MCI.

The columns are as follows:

RS # - The Record Series Number that uniquely identifies each type of record.

RECORD SERIES - A grouping of like records by classification/function.

DEFINITION - Used to describe a particular Record Series, may include sample document types.

TOTAL - The total length of time (number of years) that a Record Series must be retained.

Note: Retention periods are usually expressed as a number of years. Some retention periods are preceded by a letter. The letter is an abbreviation for a record occurrence (i.e., termination or completion of a contract). For example, C + 15 for a contract means that the contract needs to be retained for 15 years after the contract is canceled, completed, or closed.

COM - Comments concerning any unique retention requirements affecting a Record Series.

4. What is a vital record?

A vital record is the recorded information that is essential for the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers and stockholders. Roughly two to six percent, of MCI's records are identified as "vital."

5. How do you send records to off-site storage?

First find out if they have all the supplies (boxes and barcode labels) that the user will need. If not, direct them to the website and the supplies request form. If yes, then find out if they have completed the Inventory Form. What types of records they are storing, do they know their record class code, what type of description they used, etc. If they don't know what their record class code is, work together to research it in the RRS, walk them through the RRS (i.e. do not restrict yourself to the 'function' of your department; do not satisfy yourself with an RS for reports; do not

Records Management Program – Policies & Procedures

choose an RS because you like the retention period). Don't forget to tell them that if their record type changes then their record class code will be different.

Explain the following process:

- a. Complete the Inventory Form (see instructions below).
- b. Make a copy of this form for your files. Give the original to the driver when they come to pick-up the boxes.
- c. Two identical peel-off, die cut, barcode labels are provided. Affix the small barcode label to the Inventory Form where indicated. This barcode number is your carton number. This is the number you will use to retrieve and refile your cartons.
- d. Affix the larger barcode label to the narrow side of the carton under the hold handle.
- e. Schedule a pick-up by completing the *Electronic Box Pick-Up Form* on the RIM website, or if they are in a district that requesting a pick-up through the website is not feasible, direct them to the Fax Order Form.

6. How do I get something out of storage or put something back into storage?

To retrieve cartons from storage, use the *Electronic Box Retrieval Request Form* on the RIM website or the Fax Order form depending on the storage district. You will need to indicate which carton numbers you want retrieved from storage and delivered to you. You may only retrieve records stored by your department. A department may not purge any records from a box that was retrieved from storage. Cartons that are retrieved must be returned to storage within 10 business days. For an exception to this policy, contact RIM with an explanation and justification for longer retention within the department.

To refile records with your storage vendor, use the *Electronic Box Pick-Up Form* on the RIM website or the Fax Order Form to schedule carton pick-ups. To add cartons to your pick-up order, you must prepare a new request form.

7. What storage vendors do we use? Besides Iron Mountain, where are the other vendors located?

MCI has approved off-site storage contracts with several different vendors. Iron Mountain is MCI's national vendor for off-site record storage. There are five other storage vendors: Kenwood Records Management, Cedar Rapids, IA; Storage Plus, Tulsa, OK; Mississippi Filing, Jackson, MS., Datalok, Carson, CA and Recall Storage, San Leandro, CA

8. How do you complete an inventory form?

Circle either Standard Storage or Climate Control Storage at the top of the form. Do not mix electronic records with paper records. If you have both standard storage and climate control storage, you need to fill out a separate form for each type of storage.

- a. ACCT. #: Fill in the storage vendor account number for your area. See the Storage Vendor Telephone Directory or Contact List for account numbers in your area.
- b. PREPARED BY: Fill in your name (first & last).
- c. PHONE NO.: Fill in your outside telephone number here.
- d. DATE: Fill in the date the form is filled out.
- e. DEPT: Fill in your department name or four-digit department number. Location number is not needed.
- f. CARTON BARCODE: Place small die cut barcode label from the large barcode label sheet here.

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- g. RECORD CLASSIFICATION CODE: Fill in the Record Series # from MCI's Records Retention Schedule.
- h. DATE RANGE: Fill in From and Thru dates of records in carton. For example, if a box contains invoices from June 1996 to September 1996, you should fill in the "From" field with 06/01/1996 and the "Thru" field with 09/30/1996. If you only have a year, then span the entire year (i.e., 01/01/96 to 12/31/96).
- i. RETENTION CODE: Leave blank, unless instructed otherwise by Records Management. You need to complete this field if you are storing active records, or records under litigation or audit; therefore, please call RIM for the code.
- j. DESCRIPTION: 55 characters of descriptive information that FULLY explains the records in the carton. The description should be able to identify, to anyone within the company, the contents of the carton.

IMPORTANT:

The Inventory form is used to identify carton contents and ownership. It is also used to input carton information into MCI's national database of records. All storage vendors have been instructed, by RIM, to refuse pick-up of new storage cartons without accompanying inventory forms. In addition, all storage vendors have been instructed to return any cartons with incomplete inventory forms. Unique abbreviations, acronyms, numbers without qualifiers, individuals' names, terms such as: miscellaneous files, general files, desk files, old files, office files are unacceptable. Cartons containing these types of descriptions will also be returned to you. All costs associated with returning cartons to you will be charged to your department.

9. When does a user utilize a fax order form? What districts use it?

A user would utilize the fax order form when requesting storage services from Storage Plus in Tulsa, and Iron Mountain in Austin, Cleveland, Dayton, Louisville, Miami, Minneapolis, Omaha, Philadelphia, San Antonio, Seattle, or St. Louis.

10. What is the cost for storing a box? What is the charge for retrieving or refiling a box?

The cost for storage is \$.165 per cubic foot per month. Regular next day retrieval or refile is \$1.30 per carton. Delivery is \$9.00 for the trip and \$1.00 per cubic foot.

11. Who pays for storage? Is my department ever charged? If so, how much?

RIM pays for all storage costs, except for RUSH retrievals. Rush retrievals will be charged back to the department. If you are charged back for a Rush, the charges are: \$40.00 for just saying the word Rush, \$2.20 per cubic foot, and \$4.25 for retrieving of each box.

12. How long should death certificates be retained?

RS540 states C+9; however, this is used only if the death certificate is submitted due to a claim against an employee's benefits. If the death certificate is submitted but not for a claim against an employee's benefits, then it should be placed within the employee's personnel file under RS384.

13. A user calls stating they have copies of contracts and wants to know if they have to keep them? What questions should be asked?

You should ask the user what types of contracts? How can they be sure they are copies? If after speaking with the user, you determine that they are, in fact, copies, then instruct the user that

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they may destroy the records, but they have to be shredded. If they are originals, inform them of their retention requirements and let them know that they can place them in off-site storage.

14. How long does raw call data need to be retained? What questions should you ask?

Your first question should be what is raw call data? Raw call data is electronic data that comes in from the switch that is unreadable to the human eye. Raw call data indicates how long a customer was on the phone, who the customer is, what number was called, etc. This data needs to be retained for 3 years for legal purposes per LPP. The raw call data is then sent to a system that translates the data to readable form and then transports it to Billing.

15. I have old customer files that have met their retention, what do I do with them?

First verify the age of the records and determine if they have been retained for their required 3 year period. If they have, then inform the user they may destroy the records; however, they will need to be shredded.

16. A manager asks what she should do with her working personnel files. Can she throw them away? If not, can she throw away records that she knows are duplicates of what HR already has such as personnel requisitions and evaluations, etc.? Can she pass it onto the new manager if an employee transferred to another department?

Manager working personnel files must be sent to HR in Denver. If the employee is still employed by MCI but went to another department, the manager still must forward their working file to HR. The manager must not weed through the file and destroy anything. The manager may not give any information from the file to the new manager. The manager may only pass on leave information to the new manager. If the employee leaves the company, the same applies. The manager must forward the file to HR in Denver.

17. I have a bunch of files and we are moving tomorrow, but we're not taking them with us. What do I do with them?
What questions and actions should be taken?

What is your department? Where are you located? Why aren't you taking them with you? What types of files? What is the function of the records? After speaking with the user and you find that there is no retention requirements, then inform the user to destroy the records before they leave. If you conclude that there is a retention requirement, then you must insist that they take the records with them, to their new location, until they can put them into off-site storage properly. Explain to them the importance of retaining records properly and about the RIM Program, as well as the RRS and the company's liabilities if not followed. You should follow-up with facilities to ensure that the department actually did take the records with them and not leave them behind.

18. Iron Mountain calls because someone put the record classification code of RS755 and RS537 on their inventory forms and it doesn't show in their system. Do you give them a new record classification code for each? If so, what? If not, then what steps would you take.

Give Iron Mountain the new record classification code. For RS755 the record class code has been changed to RS522 and RS537 has been changed to RS285.

You then need to ask Iron Mountain who sent the boxes to storage. Call the user and inform them of the record class code change. You should also direct them to the RRS on RIM's website.

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19. A user calls and states that they have design documentation. What questions would you ask to assist them in finding the correct record series #?

You should ask what type of design documentation they have. What are the designs for (i.e., software, hardware, facilities, etc.)? Is the documentation originals or copies? If they are originals, instruct them how to use the RRS on RIM's website and how to find the correct record class code. If the documentation is copies, instruct the user that they should purge the documentation once their operational need is completed. If the user indicates that even though they are copies, they are the only copies available to MCI, and then proceed with giving them a record class code from the RRS, as well as instructions on using off-site storage if they don't already know.

20. Records Management has boxes of records concerning the destruction of records along with approvals. What record series number would you assign to the boxes? What is the retention requirement?

RS153 for 10 years.

21. You receive a call from someone who states that they have boxes of records. The records belonged to the Executive VP of CS Wireless and they have to be retained. What do you say? How do you help this individual?

Start asking all the basic questions. What type of records do they have? What is the function of the record? Are the records copies or originals? The fact that the records belong to an Executive VP does not matter. If you ascertain that the records do have a retention requirement, educate the user on RIM's website including the RRS. Give them assistance in placing the records into off-site storage, if required.

If the records have no retention, inform the user that they should be purged. If the user insists that the Executive VP does not want to throw the records out, then you need to educate the user on the reasons for the RIM Program and the risks the company, as a whole, faces when individuals within the company are not compliant. Emphasize the 'individual employee responsibility' principle – no matter the wants/needs of managers. Offer to contact his/her Manager or the VP later if the Program is not being followed.

22. A user calls and states that they have original contracts and they want to place them in off-site storage. What do you say and do?

Ask the user what type of contracts they have and how they know they are originals? If the answer is satisfactory, then inform the user of the retention requirement and how they can find the information within the RRS on RIM's website. In addition, walk them through the procedures of acquiring supplies and how to send the records into off-site storage.

23. We need to store data tapes off-site. What questions should you ask?

Ask the user if they want to store data tapes off-site for long-term or on a rotational basis. What's on the tapes? How many? If rotating, how often and how many?

The answers to the questions above will determine what you answer will be. If the department needs to store inactive data tapes that need to be retained until their retention has been met, then inform them about off-site storage, specifically vault storage and the type of box or tub needed.

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Advise them that the hardware/software to utilize the tapes must also be available during the entire retention period (if, at any time, these tapes are pulled and need to be read the system must be available. Computer systems change/upgrade constantly; it is not unknown to have tapes and other storage media that can not be accessed.)

If the department needs to storage active data tapes on a rotational basis, your answer will depend on the number of tapes. If the number of tapes to be rotated is a very small amount, then you will call Iron Mountain and have them get in touch with the user to set-up the rotation. In addition, you let Iron Mountain know that this is part of the national account. If the number of tapes to be rotated is large, then you will inform the user that their department is responsible for the cost of rotation tape storage. You need to also tell them that you can get them under the national pricing we have with Iron Mountain (if they are in an Iron Mountain district). If they are within an Iron Mountain district, you will contact Iron Mountain with the user's information, tell them that it is not part of the national account, but they should get the national pricing.

24. I am in the Tulsa Cost Center and I sent a request for a retrieval to Storage Plus and never received the box.
What should you ask or do?

You need to ask the user how they requested their retrieval? Did they do it through the RIM website or did they send a fax? If they completed the electronic retrieval request form on RIM's website, then they did it incorrectly (at this time) for the Tulsa area. In fact, which district did they choose when completing the electronic form. If they sent a fax, what fax number did they use? If they give you the correct fax number, then you need to ask them to fax you a copy of the request. You should then contact Storage Plus and find out what is going on.

25. What authority do you have for returning boxes that are not properly stored? How will you explain it to an end-user?

You have complete and total authority. Do not let anyone intimidate you into believing otherwise. You will need to explain to the end-user that Records Management is responsible for all records that have been placed into off-site storage. In addition, we are responsible for ensuring the safety, security and retention of all records. If a box is not stored properly, we will have difficulty locating that box in the future. It is imperative that every box in storage have adequate data information so that one, two or five years down the road, anyone in the company can locate the contents of the box. In cases of litigation and audit, it is imperative that the box be located in a quick and efficient manner. Besides, they may know what is in the box today, but if there isn't adequate data information for the box, they may have difficulty in a couple of years. In addition, they may not be there next year and someone else would be tasked in finding the box, for that reason and others, all data information (complete and accurate date range, record class code and a descriptive description are mandatory).

26. What do you do if an end-user does not respond to IM's e-mail regarding missing data?

Send another e-mail and copy their manager. Make sure you indicate the time frame they have to respond and exactly what information you need. Also indicate that their department will be charged for all costs associated with sending the boxes back.

27. What is the retention requirement for gross receipts? What is the record series number?

Depends if it is Federal, State or local gross receipts. Federal is 39 years under RS434, State is 10 years under RS446 and Local is 7 years under RS438.

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28. What is the retention requirement for lease payments? What is the record series number?

7 years under RS45.

29. What is the retention requirement for records regarding vacation/sick leave? What is the record series number?

8 years under RS401.

30. What would you do if individuals in the Legal department strongly insisted that they need to keep everything?

Explain how there is no such thing as keeping everything, and that there is no such thing as keeping records forever. Explain how the company and every employee must follow the company's policies and procedures regarding records and why. Explain what the RRS is for and how the RIM program is mandatory for all employees. Explain that the company would be placed in a very risky financial and legal position if the RIM policies and procedures, especially the RRS is not followed explicitly.

If you need more of an explanation: Explain how, in a litigation, the company could be fined and sanctioned if their mandatory policies are not followed. In addition, explain how the RRS could be found to be null and void if the RRS is not followed, and that would open all company records to discovery during a litigation. No company wants their records opened to discovery with no limitations. It could cost the company a lot of money.

Finally, the RIM program has been sanctioned by the company. In order to ensure that all employees are following the procedures, we will be conducting compliance audits. The compliance audits are to ensure that all procedures and especially retention requirements are being followed. Managers will be held accountable for a department's compliance.

31. What would you say if an end-user stated that since they didn't like the retention period of their record type, they were going to retain them on-site instead of off-site?

Inform them that it doesn't matter whether they retain the records on-site or off-site, the RRS must be followed. If a record has met its retention, and is not being used for an audit or litigation, then it must be disposed of. There are no exceptions unless a written justification has been sent to RIM and RIM approved it. RIM can deny any requests.

Explain to the end-user the consequences of not following the policies and procedures. See number 30 above.

32. How would you assist an end-user who knew they had boxes off-site and needed to retrieve them, but did not have the box number?

Find out where they are located and if they know which storage district the boxes are stored in. If they know where the boxes are stored, ask what information they have regarding the box, such as date range, description, department number or name, etc. While you are on the phone with them, walk them through using the query on the RIM website. If you do not find results, and it is in an Iron Mountain location, then get on the Iron Mountain website and start doing searches. I would start with department number and name. Record Class code would be my other search, and then keyword. Take the results and fax them to the end-user so that they can review the listings.

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If the boxes are located in Mississippi Filing, review the Excel spreadsheet provided by them for their records. Until we get MSF on our inventory database, you will have to use the Excel Spreadsheet.

If the boxes are located in Tulsa, finding the box is going to be very difficult until we inventory all the boxes. The user will have to know the box number or we can't help them very much.

If the boxes are located in Kenwood then we'll need to get Kenwood to perform the search. We do not have a process yet for importing their data into our database.

33. What do you do if RIM receives fax order forms without vendor information completed?

Call the end-user and ask if they sent you a copy of the form and if the original went to the vendor. If they sent you the original, then inform them that they should be sending their fax order form directly to the vendor and that only a copy of the fax form should be sent to RIM if this is their first submittal. Explain to them how to complete the form. Give them the fax number to the storage facility they are using. If they are storing new boxes, ask them to fax you their inventory forms so that you can ensure that the forms are completed correctly.

34. How long should you retain RIM's e-mail of users' requests?

6 months and then delete.

35. How long should you retain vendor's monthly inventory reports?

After reviewing and making any necessary corrections, 6 months and then shred.

36. How long should you retain vendor's outcarded reports?

After the final review and communications with end-users of the next outcarded report.

If there are outstanding issues, such as carton(s) that can not be located. The report and documentation from the end-user must be retained.

37. How would you handle an end-user that retrieved boxes from storage and never put them back?

Call the end-user and explain the process. Explain that all boxes that have been retrieved from storage must be placed back into storage within 10 business days. If they need the box for an audit, project or litigation, then they must send you a written justification for retaining the box in their location for a longer period of time. Tell them that you will check back with them in 30 days. The written justification must be updated every 30 days.

38. What would you do if the end-user in question #37 above told you that they threw the box away?

Find out what they did with the records inside the box. Did they just replace the box with another one and put another barcode label on it? Did they pull the records out, store them on-site and then destroy the box? If not, and they destroyed the records, find out why. Get, in writing, the box number, descriptive data of the records, their reason for destroying the box, and who gave

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them authorization to destroy the records. Also, give them the ‘educational’ info regarding MCI’s records program and the destruction review process.

If the end-user replaced the box and put another barcode label on it, then permanently withdraw the old barcode number from the storage vendor’s computer system. If the end-user took the records out of the box, threw the box away and kept the records on-site, find out why. If they say it’s because they now need them actively from day-to-day, then ensure they know not to destroy any of the records and that they still need to follow the legal retention requirements for the records. Also, get them to send you an e-mail explaining that they are using the records on-site and why, then permanently withdraw the barcode number from the storage vendor’s computer system.

39. If you have problems with an Iron Mountain district, whom do you contact and what should you do?

You need to contact Michael Perez, Iron Mountain Account Rep. When sending an e-mail to Michael Perez regarding problems, copy Brenda Tate, Joyce Moultry and Phil Hasselvander.

40. What is your next course of action if you contact a user initially by phone or e-mail and they never respond? What steps should you take and what is your time-frame?

If you first contact a user by telephone and they do not respond, send an e-mail explaining what you need and why. If you send an e-mail to a user and they do not respond, send another e-mail copying their Manager. Make sure you explain, in detail, what you need and why.

The time frame should be a couple of days, not weeks. If a user doesn’t respond to e-mail or phone call within 48 hours, then you should follow-up, unless, of course, you find out they are on vacation, then give them 48 hours from their return date. If they don’t respond to the follow-up within 48 hours, then you should follow-up again, by sending another e-mail explaining the consequences if they do not respond immediately. Make sure you copy their Manager. On the second follow-up, copy the Manager and the Manager’s boss.

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APPENDIX P

RIM Website Extracts